

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DONALD BERDEAUX and CHRISTINE GRABLIS, Individually and on Behalf of All Others Similarly Situated,

Plaintiffs,

v.

ONECOIN LTD.; RUJA IGNATOVA, KONSTANTIN IGNATOV; SEBASTIAN GREENWOOD; MARK SCOTT; IRINA ANDREEVA DILINSKA; DAVID PIKE; and NICOLE J. HUESMANN,

Defendants.

Case No. 1:19-cv-04074-VEC

Hon. Valerie E. Caproni

**NOTICE OF MOTION TO DISMISS  
AND/OR FOR MORE DEFINITE  
STATEMENT**

**ORAL ARGUMENT  
REQUESTED**

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PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law dated June 25, 2020, and the Declaration of Nicole J. Huesmann, dated May 1, 2020, and all the pleadings and prior proceedings had herein, Defendant, Nicole J. Huesmann, will move this Court, before the Honorable Valerie E. Caproni, at the United States District Court, Southern District of New York, 40 Foley Square, New York, New York 10007, for an Order, pursuant to FED. R. CIV. P.

12(b)(2) and 12(b)(6), dismissing with prejudice the Plaintiff's complaint in its entirety as against this Defendant and/or for a more definite statement, pursuant to FED. R. CIV. P. 12(e).

PLEASE TAKE FURTHER NOTICE that Defendant, Nicole J. Huesmann, requests oral argument on a date and at a time designated by the Court.

Dated: June 25, 2020

Respectfully submitted,

/s/ Bradley A. Silverman

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on **June 25, 2020**, the foregoing document is being served on all counsel of record or pro se parties identified on the below Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Bradley A. Silverman  
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